REMARKS

Nine claims (1-9) are pending after amendments. 1 and 6 have been amended to distinctly claim the subject matter of the present invention.

Claims 1-9 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rappaport et al. (US 2004/0229623 A1) in view of Brown (US 2003/0212588 A1), and further in view of Zimmerman et al (US 2001/0012990 A1)

The Examiner has rejected claims 1-9 as being unpatentable over Rappaport in view of Brown and further in view of Zimmerman. In essence, the examiner alleges that Rappaport, Brown and Zimmerman disclose all claimed subject matters if they are combined and further that the proposed combination is obvious to one skilled in the art. For the reasons discussed in detail hereinbelow, applicant respectfully traverses this rejection.

1. The claimed invention

Claim 1 as the representative of all claims (2-9) is directed to a wireless network simulation system for simulating wireless network performances for planning a wireless network over a predetermined layout. The system comprises a template database having a plurality of templates of wireless performance data, said wireless performance data is obtained through site surveys of a variety of locations and sites; a template identifier that operable to access the template database, the template identifier is adapted to receive search terms and to search the template database for matching templates, wherein the search terms include design factors relating to the predetermined layout; a wireless network performance contour overlay generator that operable to process the matching template based on the design factors of the wireless network and create wireless network performance contour overlays from wireless performance parameters extracted from said matching templates; and a wireless network performance contour overlay superimposer that operable to receive said predetermined layout and superimpose at least one of said

wireless network performance contour overlays onto said predetermined layout producing a superimposed layout.

2. *Examiner fails to establish a Prima Facie case of obviousness*

The examiner explicitly concedes that Rappaport fails to disclose a template identifier that operable to access the template database, the template identifier is adapted to receive search terms search form the template database for matching templates, wherein the search term include design factors relating to wireless network and the predetermined layout as claimed in the present invention. Then the examiner alleges that Brown discloses receiving at a user computer a list of object templates from a host computer system, selecting an object template from a list of object templates, which is equivalent to the above underlined feature. We respectfully disagreed with the Examiner.

Contrary to the examiner's allegation, Brown discloses that the form object template is a form provided for acquiring parameters (see paragraph [0057], for example) for installation planning. In contrast, the template database as claimed in Claim 1 provides templates of wireless performance data, which is obtained through site surveys of a variety of locations and sites. Further the template identifier as claimed in Claim 1 is adapted to receive the search term (parameters) and to search for matching template. Therefore, Brown fails to support the Examiner's allegation that Brown discloses a template identifier that operable to access the template database, the template identifier is adapted to receive search terms search form the template database for matching templates, wherein the search term include design factors relating to wireless network and the predetermined layout as claimed in the present invention.

Further, the Examiner further explicitly concedes that Rappaport-Brown does not disclose a network performance contour overlay generator, that operable to process the matching template based on the design factors of the wireless network and create network performance contour overlays from performance parameters extracted from said matching templates and a network performance contour overlay superimposer for

receiving predetermined layout. Then the examiner alleges that Zimmerman discloses overlay of IP protocol layer of the transmissions network of FIG. 1 as generated by a conventional IP NMS application, and mapping out overlay including the network elements operative in the protocol layer.

We respectfully submit that the claimed subject matter as claimed in Claim 1 relates to a system for simulating wireless network, and the wireless network performance contour overlay generator is operable to process the matching template and create wireless network performance contour overlays from the performance parameters, and the wireless network performance contour overlay superimposer that superimposes the wireless network performance contour overlays onto said predetermined layout.

In contrast, the Zimmerman is adapted for wired network, not wireless network. Further, the overlay of the network layers provides only the various link, not wireless network performance contour overlays. Therefore, Zimmerman also fails to support the Examiner's allegation that Zimmerman discloses a network performance contour overlay generator and the overlay superimposer as claimed in Claim 1.

In light of the above, the examiner fails to show how and why Rappaport, Brown and Zimmerman are combined to reach the claimed subject matters of the present invention.

Even if Rappaport, Brown and Zimmerman are impermissibly combined, for the sake of argument, they fail to teach or suggest all claimed features of the present invention. For example, as discussed above, the claimed template identifier adapted to receive search terms and search the template database. Therefore, applicant respectfully submits that the examiner fails to establish a *prima facie* case of obviousness to claims 1-9 over Rappaport in view of Brawn and further in view of Zimmerman.

Conclusion

Claims 1-9 are in condition for allowance. Therefore, Applicant respectfully requests that the rejection to Claims 1-9 under 35 U.S.C. 103(a) be withdrawn.

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

PYPRUS PTE LTD

By _____

George D. Liu

Reg. No. 47,752

Tel.: (703) 536-1713